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File Number: 161848

November 30, 2015

Chief Judge Petrese B. Tucker
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
Room 16613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: Lloyd's/GCube v. JTEKT North America Corp.
USDC (E.D.Pa.) No. 2:15-cv-05713-PBT

Dear Judge Tucker:

Please be advised that Defendant, JTEKT North America Corporation (f/n/a Koyo Corporation in U.S.A.) ("JNA") is not going to oppose the pending Motion for Remand [ECF 7] and that the proposed Order [ECF 7-2] may be entered on the docket.

JNA did not design, manufacture or distribute the bearing product(s) at issue and cannot justify the expense to fight an unnecessary jurisdictional battle despite the proper removal on the papers served. JNA has already put opposing counsel on notice of its Fed.R.Civ.P. 11 violation, and will simply pursue its dismissal and recovery of the needlessly growing defense costs in the state court forum.

Our thanks to you and your staff for your brief attention to this civil action. Happy holidays.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard B. Wickersham, Jr.', written over a horizontal line.

Richard B. Wickersham, Jr.

RBW:tmc

cc: Paul R. Bartolacci, Esquire/Daniel J. Luccaro, Esquire